



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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JUN 26 2013

Ref: EPR/N

Mr. Donald A. Simpson
State Director, Wyoming
U.S. Bureau of Land Management
P.O. Box 1828
Cheyenne, WY 82003-1828

Re: Gateway West Transmission Line
Project Final Environmental Impact
Statement
CEQ # 20130102

Dear Mr. Simpson:

The U.S. Environmental Protection Agency (EPA) Regions 8 and 10 have reviewed the Gateway West Transmission Line Project Final Environmental Impact Statement (EIS) prepared by the U.S. Bureau of Land Management (BLM). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

PROJECT DESCRIPTION

Rocky Mountain Power and Idaho Power (proponents) are proposing to construct and operate approximately 990 miles of new 230-kilovolt (kV), 345-kV, and 500-kV electric transmission lines between Windstar Substation at Glenrock, Wyoming and the Hemingway Substation near Boise, Idaho. The proposed project is broken up into ten segments. The proponents are requesting right-of-way grants from the BLM and special use permits from the U.S. Forest Service.

The project includes three new substations and expansions or modifications at nine existing substations. Other project components include: communication systems, optical fiber regeneration stations, substation distribution supply lines and access roads. The proposed transmission lines would increase capacity and improve reliability in the existing transmission grid, allowing for the delivery of up to 1,500 megawatts of additional energy for the proponents' service areas in Utah and Idaho and to other interconnected systems.

EPA COMMENTS

The EPA commends the BLM for their extensive coordination with cooperating agencies, stakeholders and the general public that occurred throughout the entire NEPA process for this project and their

responsiveness to our comments on the Draft EIS. The Final EIS includes improved resource protection measures. For example, the proponents and agencies made project modifications to avoid impacts to greater sage-grouse and developed a mitigation strategy with a commitment to replace the habitat services lost for unavoidable impacts to sage-grouse habitat. As the project moves to the implementation and operation phases, we encourage the BLM and the proponents to continue to seek means to avoid impacts within the selected right-of-way and we offer the following specific suggestions.

Aquatic Resources

Overall, the Final EIS addresses the majority of our aquatic resource comments on the Draft EIS. We particularly appreciate that the proponents and the BLM have agreed to additional protections to non-federal lands and aquatic resources, such as WET-2. We also appreciate that the Final EIS recognizes that functions and values “will be used to assist in determining the extent of mitigation for unavoidable impacts to wetlands.” Also, the additional wetlands geospatial information improved the reader’s ability to understand the potential for the project to impact these important resources.

The mitigation framework in Appendix C-2 discusses use of an In-Lieu Fee (ILF) to address mitigation needs. It was not clear whether the proponent or a third party would incorporate and manage the ILF. The Final EIS also did not discuss whether an ILF would be the appropriate mechanism for mitigation under the 2008 Mitigation Regulations. Please consider adding clarification of these points in the final mitigation plan.

As the project moves to construction, we recommend utilizing existing lodging facilities for housing construction workers whenever possible. If man camps are utilized for some segments, it is important they be sited and designed with waste handling practices that assure protection of surface and ground waters.

Siting Constraints

The new EIS section 1.3.5, “Existing Transmission System Reliability Constraints,” is responsive to EPA’s request for additional information regarding the project-wide application of a 1,500-foot minimum separation distance. We note that the Final EIS discussion includes information from a study commissioned by the Wyoming Infrastructure Authority, “Framework for Analyzing Separation Distances between Transmission Lines in Wyoming” by ICF International (ICF Study) that supports flexibility in setting separation distances. We recommend that the BLM consider the feasibility of allowing for site-specific reductions when there are opportunities to reduce impacts to particularly sensitive or rare resources.

Consistent Application of Environmental Protection Measures

Our review found that overall the Final EIS contained a robust package of environmental protection measures (EPMs). We note that some EPMs applied to federal lands and are not used on non-federal lands. The EPA recommends that the proponents consider adopting use of the EPMs on non-federal lands, particularly WET-1, TESWL-14 (formerly TEWSL-1) and VEG-12 (formerly VEG 8).

Thank you for the opportunity to provide comments on the Gateway West Transmission Line Project Final EIS. If you have any questions or would like to discuss our comments, please contact me at 303-312-6925 or the lead reviewer of this project, Carol Anderson, at 303-312-6058. Erik Peterson of EPA Region 10 also provided comments and can be reached at 206-553-6382.

Sincerely,



Suzanne J. Bohan

Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

cc: Walt George, BLM Project Manager



